

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

BINGLIN ZHONG,

Plaintiff,

v.

SHANGHAI JINGSUN TECHNOLOGY CO.
LTD AKA 'MILLIONHOM',

Defendants.

Case No.: 25-cv-2973

Judge Matthew F. Kennelly

**Magistrate Judge Keri L. Holleb
Hotaling**

STATUS REPORT REGARDING DISCOVERY

Defendant Shanghai Jingsun Technology Co., Ltd. d/b/a Millionhome (“Defendant”), respectfully submits this status report discussing the status of discovery.

Written Discovery

Plaintiff provided responses to Defendants’ first set of interrogatories and request for production of documents on November 10, 2025. The production provided was deficient. Defendant will seek leave to file a reply with the reply attached to the pending motion at Docket 40 by this Friday, November 14, 2025, and will proceed with the pending motion to compel, for sanctions, and to extend the deadline for the discovery cutoff.

Deposition

Defendant has requested an in-person deposition of Plaintiff, given the concern of coaching and the doubt about Plaintiff’s true identity. In addition, the Chinese mainland has local law prohibiting depositions for US litigation purposes, and this has been recognized by courts in this district. *See Inventus Power v. Shenzhen Ace Battery*, 339 F.R.D. 487, 507 (N.D. Ill. 2021) (granting motion to compel). To accommodate Plaintiff’s purported location in Shenzhen, China,

Defendant proposed an in-person deposition in Hong Kong, which is a 30-minute drive away from Shenzhen. Plaintiff's counsel did not agree to an in-person deposition and refused to request Plaintiff to be deposed outside of mainland China. Plaintiff's counsel also refuses to provide the availability of the Plaintiff for a deposition unless Defendant agrees to depose Plaintiff in the Chinese mainland remotely. Plaintiff's counsel insists that Defendant serve a deposition notice first before the parties reach an agreement on details. As such, Defendant will issue a notice of deposition with a tentative date by the end of this week. If Plaintiff continues to refuse to be deposed outside of the Chinese mainland, Defendant will have to seek help from this Court.

In conclusion, the deposition of Plaintiff has not occurred yet, due to no fault of Defendant's counsel.

DATED: November 12, 2025

Respectfully Submitted:

By: /s/ Shaoyi Che
Shaoyi Che
Texas Bar No. 24139843
Admitted to N.D. Ill.
YoungZeal LLP
9355 John W. Elliott Dr, Ste 25555
Frisco, TX 75033
Telephone: (717) 440-3382
che@yzlaw.com

ATTORNEY FOR DEFENDANT